

**Covanta Haverhill, Inc.**  
**Material Separation Plan VI for Mercury Containing Products**  
**January 1, 2013 - December 31, 2017**

**August 29, 2012**

Purpose: Compliance with 310 CMR 7.08(2) Regulations Governing Municipal Waste Combustors

Submitted to: Massachusetts Department of Environmental Protection  
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## **I. Background and Purpose**

In 1998, the Massachusetts Department of Environmental Protection (MassDEP) promulgated regulations 310 CMR 7.08 (2) governing municipal waste combustors (MWCs). Section 310 CMR 7.08(2)(f)(7) required MWCs to submit Material Separation Plans (MSP) that describe the actions that the MWC will take for the removal of mercury-containing products from the waste stream. The MSP must be developed in accordance with the MassDEP's "Material Separation Plan Guidance Document" revised June 29, 2001.

Covanta Haverhill, Inc developed its first Mercury Product Material Separation Plan and submitted the proposed plan on October 31, 2000. MassDEP issued final approval for MSP I on February 2, 2001. MSP I was conducted from February 2001 until July 2002. Subsequently, the MSP II program ran from July 2002 to June 2004. MSP III ran from July 2004 to December 31, 2006, MSP IV ran from January 1, 2007 to December 31, 2009, and MSP V will run from January 1, 2010 to December 31, 2012.

In 2004, the MSP timelines were revised by MassDEP to provide sufficient opportunity for review of annual reports, development of future MSP plans, review by MassDEP, and the finalization of the plan. In accordance with those new timelines, MSP VI will cover the 5 year planning and implementation period from January 1, 2013 through December 31, 2017.

The following proposed sixth Material Separation Plan (MSP VI), similar to previous MSPs, has been based on MassDEP's "Material Separation Plan Guidance for Municipal Waste Combustors" revised June 29, 2001.

## **II. Overview of the MSP VI**

### **A. MSP VI Goals**

The overall goals of the MSP VI continue to be:

- Comply with applicable Massachusetts regulations;
- Implement a program that builds on existing programs, to the extent practicable;
- Coordinate with other MSP programs being implemented to minimize redundancy and make the best use of the resources being spent on this mercury diversion effort;
- Expand public awareness about mercury;
- Divert mercury products from the solid waste stream;
- Reduce the use of mercury-containing products; and
- Increase participation in mercury recycling/reduction programs

Please note that the MSP is only a planning document. Statements regarding projected diversions of mercury containing waste, budget categories, etc. are provided

in response to MassDEP requests for estimates of anticipated program results. They are not intended to serve as enforceable commitments.

## **B. MSP VI Development Process**

**1. Coordination with MassDEP:** As part of MSP VI planning, Covanta Haverhill met with MassDEP Boston staff in the spring 2012 to review the results of the previous year's MSP efforts and discuss ideas for MSP VI.

The MSP group has also met independent of MassDEP to evaluate how to coordinate programs and minimize redundancy, to facilitate access to mercury diversion programs and maximize commercial, institutional and public participation in programs.

The MSP group will continue to meet and discuss how to best maximize participations in the programs. MassDEP has continued to provide Covanta and the MSP group with various informational documents related to mercury recycling, universal waste and mercury separation programs including lists of MassDEP universal waste shed grants, contacts for local/regional environmental organizations and waste grants.

**2. Coordination with Recycling Coordinators and Community Stakeholders:** As part of MSP VI planning, Covanta Haverhill held meetings quarterly at the facility where it presented its MSP VI ideas to its contract communities' recycling coordinators and the applicable MassDEP Municipal Assistance Coordinators (MACs). This continuing communication fosters information sharing between the municipalities and helps to ensure that the MSP VI implementation will continue to proceed in a coordinated, non-duplicative way.

### **3. Summary:**

Based upon our research, we have determined the following information regarding MSP programs, both past and future.

- a. **School cleanouts:** We have determined that the majority of the schools within our communities no longer need Hg product inspections\cleanouts. They have been completed either from our efforts or through the efforts of other groups. In addition, during the most recent inspections, very little Hg products were being found in today's schools. Because of this great success, during MSP VI, Covanta Haverhill will no longer have to focus a great deal of time or money towards this activity. However, we will maintain a small budget in case we need to do an additional school. We will track this activity under Municipal Reimbursement activity.
- b. **Health care clinic cleanouts:** We have determined that the majority of the clinics within our communities no longer need Hg product inspections\cleanouts. They have been completed either from our efforts or through the efforts of other groups. In addition, we believe very little Hg products are found in today's clinics. Because of this great success, during MSP VI, Covanta Haverhill will no longer have to focus a great deal of time or money towards this activity. However, we will maintain a small budget in case

we need to do an additional clinic. We will track this activity under Municipal Reimbursement activity.

### **C. MSP VI Target Sectors**

Based on the results of Covanta's experience with previous MSPs, it appears that municipal centers (city hall, community centers, transfer stations/DPW) as well as HVAC supply centers, both retail (hardware stores) and wholesale, are the most responsive to mercury diversion programs and they will continue to be a major focus during the MSP VI.

- The general public will continue to be invited to participate in diversion programs such as mercury collection events, thermometer exchanges, thermostat collections, HHW collections and other events, as appropriate.
- Residents and small businesses will be targeted for the Mercury Product Collection Program.
- Trades people (plumbers, electricians, etc.), utility companies, wholesalers and retailers will continue to be targeted for the mercury thermostat recycling program.
- Municipal government agencies (Health Department, DPW, etc) will be targeted for municipal recycling efforts such as the mercury collection events, thermometer exchanges and support for HHW events.
- Covanta municipal electric utilities will be targeted to help recycle their mercury containing products and to enlist their aid in promoting mercury product recycling to their customers.

In each of these programs, specific activities, designed to achieve the MSP VI's overall objectives, are identified and supplemented with timelines and budget estimates. Some of these activities will continue to overlap although the targeted audiences for each are different.

As these activities continue to be implemented, Covanta will assess the effectiveness of each with the intention of modifying, in conjunction with the MassDEP, various elements of the outreach initiative, as needed, to make them more effective.

## **D. Target Areas**

In MSP VI, Covanta will continue to implement its program activities in all of its twenty three (23) contract communities: Bedford, Burlington, Chelmsford, Danvers, Dracut, Essex, Groton, Harvard, Haverhill, Lawrence, Littleton, Lynnfield, Melrose, Middleton, N. Reading, Reading, Stoneham, Tewksbury, Tyngsboro, Wakefield, Westford, and Windham, NH and Greenland, NH.

Based upon the experience gained in previous MSP's, different outreach techniques will be utilized for different towns, based upon size, population, and their willingness to participate in various activities. Details of these efforts are explained in following sections.

Covanta Haverhill would be willing to examine proposals from non-contract communities provided certain commitments were made by that community:

- The community would need to commit its waste to Covanta Haverhill for the duration of MSP VI plan (Five years).
- Community would need to provide certain documentation to prove that their waste has been disposed of at Covanta Haverhill, both for the past year and for the next two years.
- Community would need to show a willingness to participate in the Covanta program activities.

### **III. Proposed MSP VI Activities 01/01/13 -12/31/17**

#### **A. Consultant Outreach\Education Activities**

##### **1. Activity Description:**

Covanta and Wheelabrator, collectively, "the MSP group", continue to utilize its trade organization, Energy Recovery Council (ERC) to assist in the development of the public education and information campaign. The Energy Recovery Council is a national waste management trade association that includes Covanta and Wheelabrator, among others.

Covanta Haverhill will also explore using the services of CET (Center for EcoTechnology).

Consultant Outreach\Education Activities proposed for MSP VI include:

- Maintaining the “KeepMercuryfromrising.org” website;
- Developing updated advertisements targeting our sectors;
- Implementing ad campaign using media outlets such as print ads, radio ads, TV ads, billboards, and social media streams.
- Developing outreach flyers and door hangers
- Introducing Hg MSP activities into HVAC training courses and other curriculum.
- Developing an outreach newsletter
- Conducting outreach tables at community events, and at HVAC supply centers

##### **2. Activity Evaluation:**

This activity will be measured and evaluated by documenting the outreach activities that are completed during the year. A summary of this information will then be provided in the MSP annual report.

##### **3. Activity Budget:**

For the Consultant Outreach component, Covanta has budgeted \$50,000/year. See details of these costs in Appendices B.

The public education effort, as described, is conditioned on all members of the MSP group providing adequate funding. The cost figures provided herein represent only Covanta Haverhill's share of the public education effort based on a sharing formula agreed to by the MSP group.

MassDEP should be aware that if funding falls below the level anticipated

because another MSP group member does not agree to fund at a certain level, then all the public education efforts might not be completed as planned.

## **B. Facility-Level Outreach/Education Activities**

### **1. Activity Description:**

All plan activities will be conducted under the guidance of the Covanta MSP program manager. In addition, Covanta is budgeting for consultant support to help conduct the many outreach/education activities detailed in the MSP VI. Some of the facility level outreach activities will include:

- Working with contract municipalities to distribute information to the public regarding the Massachusetts Mercury Management Act;
- Researching existing Municipal Hazardous Waste\ Mercury collection programs to determine how Covanta can support such programs;
- Incorporating more businesses into the MSP VI activities. Work will include door to door outreach and phone call campaigns in each target town to establish contacts, explore their current practices and work to determine easiest way for them to participate in Hg product recycling. Additional description of these efforts is included in following sections under each activity's outreach methods;
- Coordinating with a local advertiser to publicize program activities;
- Working with municipal officials to incorporate information on Covanta's Hg MSP activities into their advertisements for household hazardous waste collection programs, brochures for municipal recycling programs and mass mailings that are sent to residents and businesses from the municipal tax assessment, recycling, water or electric departments. Covanta will provide the outreach brochures to the municipalities and will cover any additional costs associated with the mailings;
- Continue MSP outreach with the business community by working with the local Chambers of Commerce, Rotaries, League of Women Voters, and other business associations. Plan to hold ten (10) informational meetings per year in an ongoing effort to maximize communication about the program to the business community;
- Continue to send press releases detailing MSP event successes to newspapers and other media to provide program feedback to the residents and the business community;
- Continue contact and communication efforts with community/public sector leaders and environmental/activist groups, which have an interest in, or are already engaged in mercury diversion programs;



- Continue contact with mayors, state representatives, congressmen, educators, and other opinion leaders to inform them about Covanta's program and gain their support for it;
- Continue with outreach efforts in the health care fields, including veterinarian clinics;
- Increase use of public service announcements in newspapers, community TV, etc;
- Work with consultants to make mercury presentations at school assemblies;
- Work with MassDEP's MACs, as well as contract community municipal recycling coordinators to get information out to the communities on the facility's MSP activities;
- Attempt to work with area utilities such as National Grid, Bay State Gas, Littleton Electric Light & Water Depts. Efforts would include an mercury outreach table at any energy efficiency seminars.
- Work with contract communities on passing bylaws requiring proper adherence to mercury regulations by tradesmen getting remodeling permits. Tradesmen should include methods to be used for recycling any mercury products removed.

## **2. Activity Evaluation:**

This activity will be measured and evaluated by documenting the outreach activities that are completed during the year. Where possible, the numbers of attendees, participants, etc will be documented. A summary of this information will then be provided in the MSP annual report.

## **3. Activity Budget:**

For the 5 year period, Covanta has budgeted \$150,000/ year for this component to cover the Covanta MSP program management costs, special outreach and collection advertisements, and consultant education\ outreach program.

Covanta MSP program management costs includes the MSP program manager's salary, benefits, and expenses; office support personnel costs related to MSP, Covanta management MSP oversight costs, share of office costs including telephones, utilities, postage, etc and future development costs.

On a routine basis, the MSP manager meets with Covanta management to review results, discuss problems and make changes. In addition, Covanta management is extensively involved with MSP development including plan review & revision, meetings with industry reps and meetings with MA DEP.

## **C. Mercury Product Collection Program**

### **1. Activity Description**

This activity will target the diversion of mercury containing products from residents, municipal departments, schools, and small businesses.

Listed below is a list of mercury product collection options that are available to Covanta's contract communities.

Collection Options include:

a) Most of Covanta's communities have year round drop off Mercury Product Collection locations (sheds). For these communities, both residents and businesses are allowed to drop off mercury products year round at the shed located at the town's DPW yard or transfer station provided that certain conditions are met.

Under this option, Covanta will not hold additional day events, but will help the community promote their year round collection location through advertising/outreach and will support the costs of recycling the Hg products that collected at these locations. This option is appropriate for eighteen (18) of the contract municipalities.

b) For communities that have a Mercury Collection Shed, but elect to not allow businesses to participate, Covanta will continue to hold separate Mercury Collection Events. This includes: Danvers, Haverhill, Middleton, and Wakefield.

These are four (4) 2-6 hour periods on specific days when the Covanta MSP Coordinator accepts mercury products from businesses and places the items in the shed for future pickup. These special collections are advertised in local papers as well as a mass mailing that precedes them. An event is organized every two (2) months during the spring/summer/fall. This option is used for the bordering communities of Danvers and Middleton. These events are held alternating between the transfer stations of those towns. Outreach is accomplished through advertising in local papers, large posters are distributed to businesses, and a mass mailing is sent to the local businesses. This approach will continue to be used in MSP VI.

c) Other Hg product recycling options that Covanta will work on during MSP VI include: Shipment of mercury items along with hazardous waste shipments, use of pre-paid mailers such as Veolia's RecyclePac, or direct shipments of products to the recycler under Covanta's 50% reimbursement program. In addition, many local retailers have agreed to accept bulbs from customers of Covanta. In this option, the retailer is supplied with small labeled boxes to be used for spent compact fluorescent bulbs (CFLs). These boxes are given to customers when replacement bulbs are purchased. This box serves as a reminder to return the spent CFLs back to the store in the future.

Another popular option for municipal departments, schools, and non-profit institutions is for Covanta to schedule pickup of bulbs directly from their location. This limits the municipality's labor and possibility of breakage.

## **2. Activity Outreach**

The Consultant campaign, as discussed above, will be an important component of the outreach campaign. This campaign consists of public service announcements, radio spot advertisements and Web-based tools.

Complemented by this broad outreach campaign, additional outreach and educational efforts will be conducted by the Covanta MSP program manager and consultant support. The following initiatives will continue to be conducted specifically for this activity:

- With the assistance of the municipalities, designate locations, dates, and staff for these collection events;
- Determine the availability of municipal personnel and/or environmental group volunteers to assist with these events, if necessary;
- Place advertisements in local papers for single Collection Events. Other ads will be placed for certain towns to advertise their year round drop off locations for Hg recycling such as the local transfer station;
- Coordinate with ERC's contractor (website) to publicize this program to residents and small businesses on the MSP website;

- Coordinate with local media to advertise and/or publicize this program to residents and small businesses;
- Develop initiatives to incorporate small businesses into the programs such as notices on MassDEP letterhead asking for cooperation;
- Continue to coordinate with municipal officials in efforts to develop official event notices to residents and small businesses;
- Work with municipal officials to incorporate Covanta's Hg MSP activity information onto the town's recycling brochures and HHW event notices;
- Work with municipal officials to attach Covanta's Hg MSP brochures with the town's mass mailings (tax bills, water bills, electric bills, etc) to residents\businesses;
- Continue to utilize the municipalities' existing system for advertising household hazardous waste collection programs;
- Develop additional advertising sign boards and large street banners to advertise a collection event or advertise the town's year round drop off option. Work with local officials to determine proper location to place banners/boards; and
- Work with Covanta sponsored community events, such as fall festivals, Christmas fairs, etc, to advertise MSP activities as well as an invitation to stop by and visit the Covanta outreach table.

### **3. Activity Evaluation**

This activity will be measured and evaluated by determining when possible, the number of contacts made, the level of business participation and the amount of wastes diverted, such as the number of devices/bulbs collected, and the equivalent quantity of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

### **4. Activity Budget**

For the MSP VI, Covanta is budgeting \$30,000/ year for this activity. Costs include advertising costs, event outreach costs, recycling contractor's labor/ transportation costs, and mercury recycling costs.

## **D. Thermometer Exchange Program**

### **1. Activity Description**

Massachusetts Law (Chapter 39 of the Acts of 2002) banned the sale of mercury fever thermometers. Since then, Covanta has observed that the number of the thermometers being exchanged has been declining steadily.

In past MSPs, Covanta has worked with its communities to conduct thermometer exchange events in connection with the town's annual flu clinics. At these events, residents could drop off Hg thermometers and receive a non-Hg replacement.

For MSP VI, Covanta will continue to support this activity in all Covanta contract municipalities that wish to continue to participate. For MSP VI, Covanta will expand these programs to allow residents to also drop off thermostats.

Thermometer swaps/exchanges and thermostat collections are an extremely effective tool in helping to educate the general public on mercury issues while helping to remove a potential mercury waste material and health hazard from the home.

As in the past, Covanta will conduct the swaps/exchanges/collections in conjunction with the Boards of Health, Recycling Committees or other municipally designated entity.

Ideally, dates and/or locations will be chosen that take advantage of other activities occurring in the municipalities that will enhance program exposure and improve participation.

Advertisements will be placed to encourage residents to utilize this option. The collection of spent mercury thermostats will also be included in all advertisements/notices.

Covanta has purchased digital thermometers and will continue to make them available for distribution in the swaps/exchanges.

Thermostats turned in will not be replaced, however an incentive for residents will be explored to encourage participation.

Covanta will work closely with local boards of health that issue permits/make inspections to insure mercury product recycling is included.

### **2. Activity Outreach**

Covanta's MSP program manager will maintain contact with the Boards of Health, Recycling Committee or other municipally designated entity, as appropriate, to facilitate thermometer exchanges/thermostat collections in the Covanta contract municipalities. The MSP program manager will coordinate delivery of the digital thermometers, pails and spill kits for use during the collection and arrange for pick-up and recycling of the collected material. Covanta will offer spill kits to each board of health. Covanta will publicize the events utilizing posters, notices, road side sign boards/banners and

advertisements in local newspapers.

### **3. Activity Evaluation**

This activity will be measured and evaluated by determining the amount of thermometers\thermostats collected and exchanged and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

### **4. Activity Budget**

For the MSP V, Covanta is budgeting \$5,000/ year for this activity. Costs include advertising costs, mercury recycling costs, and travel for 23 communities. No additional money is being budgeted to purchase additional thermometers since the facility still maintains an adequate inventory.

## **E. Municipal Mercury Recycling Reimbursement**

### **1. Description of Activity**

In order to assist communities with the costs associated with mercury product recycling, Covanta will continue to reimburse any Covanta contract community for the costs incurred in the collection, storage and recycling of residentially and/or municipally generated mercury containing products (fluorescent lights, thermostats, thermometers etc.), items collected at one-day Mercury Collection Events or at permanent facilities (either permanent HHP centers or Universal Waste Sheds) or as previously mentioned. The goals of this activity are:

- Increase the public's awareness of mercury, health and environmental issues surrounding mercury content products, and the potential impacts of improper disposal;
- Increase collection of mercury containing products;
- Creation of a sustainable, highly beneficial, low cost program;
- Increased participation of communities with limited resources by supporting the residential collection program through subsidized mercury product collections;
- Supplying them with a Universal Waste Shed and reimbursing the cost of recycling the residentially and municipally generated materials;
- Periodically inventory transfer station sheds for spill kits, replace if missing; and
- Offer each community's Hg product handlers Hg spill training by an experienced consultant.

### **2. Activity Outreach**

Outreach for this activity consists of Covanta's MSP program manager continuing to meet with local municipal officials (DPW, Boards of Health, public utilities, recycling coordinators, etc.) to explain the benefits of our program and soliciting their participation in the numerous activities that we support: Universal Waste Shed Grants, thermometer exchanges, mercury product collections, in addition to the reimbursement offered to municipalities for collecting and recycling mercury containing products generated by municipal buildings, residents or, if allowed by the municipality, small businesses.

### **3. Activity Measurement**

This activity will be measured and evaluated by documenting equipment/support provided to each municipality and determining the amount of waste collected and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

### **4. Activity Budget**

For the MSP VI, Covanta is budgeting \$30,000/ year for this activity.

## **F. Thermostat Collection Program**

Massachusetts Law (Chapter 190 of the Acts of 2006) states that thermostats with silver liquid in glass cylinder must be handled as either a hazardous waste or Universal Waste.

### **1. Activity Description**

A significant portion of mercury contained in the municipal waste stream is entering through the improper management/disposal of mercury containing thermostats. While programs are available for the recycling and reclamation of these products, participation by the wholesalers, HVAC trades people and consumers are limited, at best.

Covanta will continue to distribute thermostat collection containers to wholesale distributors of thermostats in the Covanta contract municipalities who wish to participate in the Covanta recycling program but have not yet signed-up to join. Covanta has an inventory sufficient to supply all the wholesale distributors of thermostats within the Covanta contract municipalities that wish to participate.

Additionally, Covanta will continue to offer an added incentive to encourage the HVAC and other trades people to return end-of-life thermostats for recycling. Covanta has designed and is implementing a program that is offering a \$5.00 cash "incentive" to trades people (plumbers, electricians, HVAC technicians, fuel oil dealers, etc.) in the Covanta contract municipalities for each mercury thermostat returned for recycling.

New for MSP VI, Covanta will explore offering residents an incentive to return thermostats when they attend Covanta manned collection events and/or community outreach events such as town festivals and fairs.

Covanta is also offering to set-up thermostat recycling at retail locations in the Covanta contract municipalities that would like to participate. GSG Supply Inc and FW Webb of Haverhill have already joined this program.

While there is no financial incentive for the retail business to agree to participate, Covanta will supply all materials that are necessary (mercury spill kits, buckets, flyers, stickers, posters, newspaper advertisements, etc) to participants at no charge and will cover all costs associated with the collection and recycling of the mercury thermostats.

Additionally, display ads will be placed in local newspapers to publicly recognize the wholesale and retail participants in the program for their leadership and commitment to their community. Covanta will work with building inspectors to insure information on recycling of mercury products is part of the permitting process.



## **2. Activity Outreach**

Covanta will hold informational meetings for the HVAC industry, utilizing, where possible, their trade associations, designed to gain their support and participation in the thermostat recycling program. Covanta will also utilize outside consultants to aid in contacting and recruiting participants for this program. Covanta will also ask local building inspectors to require recycling of mercury products as part of their permit process. As part of the MSP VI, Covanta will contact the utility companies operating in our service area to coordinate efforts at digital thermostat promotion and mercury thermostat replacement.

## **3. Activity Evaluation**

This activity will be measured and evaluated by documenting the equipment provided, rebate incentives/grants awarded and determining the amount of waste collected and the equivalent amount of mercury diverted from the waste stream. A summary of this information will then be provided in the MSP annual report.

## **4. Activity Budget**

For the MSP VI, Covanta is budgeting \$15,000/ year for this activity. Costs will cover advertising, mercury recycling costs, and costs of the recycling rebate incentive grants.

#### **IV. Proposed MSP VI Budget 01/1/13-12/31/17**

The MSP VI covers the 5 year period of January 1, 2013 - December 31, 2017.

In 2011, approximately 600K tons of waste was processed at the Covanta Haverhill facility.

The cost of implementing the proposed mercury diversion program will not exceed the \$0.50 per ton value as per the MA DEP's Guidance. Therefore, the budget for MSP VI can not exceed \$300K.

As proposed, Covanta Haverhill is budgeting \$280,000\year for MSP VI.

As the program continues to be implemented, Covanta will assess its effectiveness with the intention of modifying the MSP VI, as necessary, in conjunction with the MassDEP.

While actual expenditures may change somewhat between the categories to make necessary mid-course adjustments that enhance overall program effectiveness, it is anticipated that the relative budget priorities should remain proportionately similar to that presented above. See budget breakdown in Appendix B.

## **V. MSP VI Activity Timeline 01/01/13 - -12/31/17**

In general, the time line for the 01/01/13-12/31/17 MSP VI is as follows:

1st Quarter 2013: Continue ongoing program operations and continue to approach and implement collection programs in remaining Covanta contract communities; continue to do schedule and hold thermometer exchanges; continue outreach work with wholesalers, retailers and trades-people for the thermostat "rebate" collection program; continue to follow-up with any remaining municipalities that have not taken advantage of the Covanta Universal Waste Shed purchase/reimbursement program.

2nd Quarter 2013: Schedule collections for spring 2013; continue outreach work with wholesalers, retailers and trades-people for the thermostat "rebate" collection program; continue with the implementation of the school mercury clean out program; continue to hold informational meetings in various communities to explain the Covanta program; review data.

3rd Quarter 2013: Continue outreach work with wholesalers, retailers and trades-people for the thermostat "rebate" collection program; continue to work with the municipalities on mercury product collections; hold informational meetings in various communities to explain the Covanta program.

4th Quarter 2013: Continue outreach work with wholesalers, retailers and trades-people for the thermostat "rebate" collection program; continue to work with the municipalities on mercury product collections; hold informational meetings in various communities to explain the Covanta program and the goals for the coming *year*; begin process of reviewing data, writing and submitting the annual report.

1st Quarter 2014: Continue planning and conducting thermometer swaps/exchanges; continue work on the Universal Waste Shed procurement program; continue work on the thermostat "rebate" collection program; continue outreach and implementation of mercury collection-day program in remaining contract communities.

2nd Quarter 2014: Continue implementation of the mercury collection/recycling programs in the contract communities; continue to plan and hold thermometer swaps/exchanges in Covanta communities; continue to work with communities interested in procuring Universal Waste Sheds; continue work on the thermostat "rebate" collection program; continue to hold informational meetings in various communities to explain the Covanta program and the goals for the coming year.

3rd Quarter 2014: Continue working with communities to set-up mercury product collection events; continue work on the thermostat "rebate" collection program; continue to hold informational meetings in various communities to explain the Covanta program.

4th Quarter 2014: Continue ongoing program operations and continue to approach and implement collection programs in remaining Covanta contract communities; schedule

collection events in additional communities; schedule thermometer exchanges continue outreach work with wholesalers, retailers and trades-people for the thermostat "rebate" collection program; follow-up with municipalities that have not taken advantage of Universal Waste Shed purchase/reimbursement; review data and prepare annual report

1st Quarter 2015: Continue planning and conducting thermometer swaps/exchanges; continue work on the Universal Waste Shed procurement program; continue work on the thermostat "rebate" collection program; continue outreach and implementation of mercury collection-day program in remaining contract communities.

2nd Quarter 2015: Continue implementation of the mercury collection/recycling programs in the contract communities; prepare schedule for spring collection events, continue to plan and hold thermometer swaps/exchanges in Covanta communities; continue to work with communities interested in procuring Universal Waste Sheds; continue work on the thermostat "rebate" collection program; continue to hold informational meetings in various communities to explain the Covanta program; continue with the implementation of the school mercury clean out program.

3rd Quarter 2015: Continue working with communities to set-up mercury product collection events; finalize schedule of 2012 collection events; continue work on the thermostat "rebate" collection program; continue to hold informational meetings in various communities to explain the Covanta program and the goals for the coming year.

4th Quarter 2015: Continue ongoing program operations and continue to approach and implement collection programs in remaining Covanta contract communities; schedule collection events in additional communities; schedule thermometer exchanges; continue outreach work with wholesalers, retailers and trades-people for the thermostat "rebate" collection program; follow-up with municipalities that have not taken advantage of Universal Waste Shed purchase/reimbursement; review data and prepare annual report.

## **VI. Measurement and Evaluation**

A means of accounting for the materials collected from each diversion program and monies expended for each program will be built into each program implemented. This can include record keeping at each event, tracking of the total amount of material diverted to mercury recycling, number of vehicles, and estimates of the amount of mercury collected, etc.

Complete Recycling Solutions furnishes actual counts of materials {numbers of thermostats, thermometers, switches, etc) diverted through the Covanta collections programs. This enables Covanta in their annual reports to use a more standardized and consistent conversion method when calculating the mercury content in the materials diverted.

The collection of this data and feedback will allow for program adjustments, fine-tuning and assessment of program effectiveness and will be utilized when preparing the annual reports.

As the program is implemented, Covanta will continuously assess its effectiveness and review the timeline with the intention of adopting modifications, in consultation with the MA DEP, as needed.

# APPENDIX A

## Consultant Outreach/Education Program Proposal from Center for EcoTechnology

### Outreach and Education Proposed Menu of Services for Covanta Haverhill

The following is a menu of services designed to help Covanta Haverhill deliver “Outreach and Education” as planned under MSP, to be provided by the Center for EcoTechnology (CET). CET has prepared this menu of service offerings with the understanding that CET and Covanta Haverhill will coordinate to select priority areas to focus on. Not all the menu items will necessarily be addressed in any one year, but instead this provides a range of opportunities that can be tested and modified over time to appropriately maximize the use of resources to best help Covanta Haverhill reach its MSP goals. As new opportunities or project ideas present themselves, this plan can be modified.

#### MENU

##### **1. Advertising and Outreach to Local Businesses and Residents**

CET will work closely with Covanta Haverhill staff to promote mercury product diversion through a variety of strategies. These strategies will be targeted to the service region of Covanta Haverhill with the goal of increasing the visibility and awareness of existing or newly developed opportunities for residents and businesses to properly dispose of the range of mercury-containing products. CET will serve as a resource to help promote and drive participation to all types of events and opportunities that Covanta Haverhill MSP programs have a long standing record of offering to their communities.

- a. **New Ad:** CET will produce an ad(s) that can be used in community newsletters, newspapers, electronic communications and other appropriate applications, specific to Covanta Haverhill program offerings which provide a clear, locally focused message. The targeted use of this ad and local focus will distinguish it from broader mass-produced ads with the goal of raising awareness of the local options provided by Covanta Haverhill.
- b. **Engage Media Outlets with Ad:** CET will also engage the cable television companies that provide service to Covanta Haverhill communities to provide educational messaging through their outlets. This could include local cable access, public service announcements or paid advertising opportunities that will again have a local focus to raise awareness and drive participation to Covanta Haverhill sponsored, established or new outlets for mercury-containing product recycling. Some of these cable companies also have radio station affiliates and can offer package deals to couple TV ads with radio spots. This will be a high priority to pursue, and stand

alone radio promotion will also be explored with the same local, action-oriented messaging. CBS Boston, The River and WEEI radio stations are some pre-identified media outlets that CET will pursue to get this message out.

- c. **Engage Billboard companies:** Similarly, some of these media companies have billboard holdings that may be successful in targeting a locally focused message. Clearchannel is one example of a company that has billboards and CET will work with Covanta Haverhill to evaluate the potential cost effectiveness of this outreach strategy.
- d. **Door hanging campaign:** At a very localized level, and in conjunction with specific collections, CET will provide targeted local outreach and education. This may include a door-hanger campaign in office parks or other business settings, engaging local businesses, municipal buildings, or other establishments to hang posters or other educational materials, and working closely with local media to drive participation to collection opportunities.
- e. **Engage Social Media:** Local communities often have social media outlets like Facebook, twitter, etc. CET will engage local recycling officials, and other appropriate local organizations to promote collection opportunities through existing social media outlets at the community level. Simple postings on these sites have the potential to reach large numbers of people with relatively small investments of time. CET and Covanta Haverhill will work together to evaluate the effectiveness of this strategy prior to investing larger amounts of time in this way.

For all outreach efforts, CET will closely document and report all activities. CET anticipates documenting all meetings, and dates of ad postings, radio spots, TV coverage, etc. We will provide examples of materials developed and anticipated numbers of people reached through the various media outlets. Any other metrics required by Covanta Haverhill and MassDEP will be discussed and incorporated into the tracking and reporting as needed.

## **2. HVAC contractors and Builders Education:**

Reaching contractors, builders and renovation specialists is an important strategy to successfully capture mercury-containing thermostats and has been a long-standing successful aspect of Covanta Haverhill's MSP program. CET has existing relationships with this sector and can support Covanta Haverhill's efforts in unique ways.

Reporting will include any materials developed for this outreach, dates of outreach events, and approximate numbers of contractors engaged. The number of contractors that actually end up participating in the thermostat collection program through Covanta Haverhill will be another, easily measured reportable, and the ultimate goal of these tasks.

- a. **CET Training Courses (6-10):** Through CET's existing HVAC and Construction Contractors Training Services, we will be able to perform targeted outreach to this group on Hg containing products. From September to December, CET anticipates conducting 6-10 trainings within the Covanta Haverhill service territory. These trainings will reach an estimated 60-100 contractors that are likely to have an opportunity to replace thermostats in homes and businesses within Covanta Haverhill service territory.

Scheduled trainings include Duct Leakage Training, Energy Auditor training, Insulation Contractor training, Home Performance Contractors, Retrofit contractors and a 5-day BPI Building Analyst training course. CET's course developers will incorporate slides and talking points about the Covanta Haverhill Hg Thermostat program for the trainings. This will include specific information to be reviewed by Covanta Haverhill prior to implementation. CET will create a "Leave Behind" for attendees, providing details on participation in the Covanta Haverhill Thermostat program. CET staff will also follow up directly with attendees to encourage participation and answer any outstanding questions they may have.

Note: because this is a piggyback on an existing CET service, we are able to provide this at a very low per-session rate. The majority of the cost is in set up and follow up and actual number of trainings provided is an estimate.

- b. **Wholesale Supply Houses – Tabling (3-4):** Also through our Training Department, CET has existing relationships with HVAC supply houses throughout the state. There are at least 3 such suppliers that we regularly work with in the Covanta Haverhill service area and there are 8-10 more that may be appropriate to engage for this outreach. Some of these suppliers already support CET programs by posting flyers and helping promote our training events.

We propose to work with them to promote the thermostat program and also host a tabling event for CET or Covanta Haverhill staff to engage contractors while shopping at the store. This task will also include creative promotion of the event through possible social media, print flyers, and other means to be coordinated with store contacts who know the best ways to reach their customers. According to our training staff, this could be an especially effective technique as these HVAC professionals typically have a close and trusting relationship with their wholesale providers. Tabling will include promotion specifically about thermostats, but could include information about any mercury-containing products. CET will also conduct follow up with these customers to encourage participation and answer any questions they may have.

- c. **Permitted Contractor Outreach:** CET will reach out to the State Board of Building Regulations and Standards which licenses construction contractors in Massachusetts. CET will seek to reach contractors and educate them about the thermostat program



through existing channels at this state agency. This could include providing information on the thermostat program as part of the license renewal process, including information in an existing newsletter, email service, or other electronic communications, or direct communications through their database of contractors. Any of the proposed strategies will require identifying appropriate decision makers at this agency, development of the appropriate outreach materials and possible follow up based on the strategy employed.

### **3. Covanta Haverhill E-Newsletter:**

CET proposes to set up a newsletter/bulletin using Vertical Response, an online marketing platform that provides businesses and non-profits with the ability to create and manage email marketing, social media marketing, online surveys and direct mail campaigns. It has over 100,000 customers, and won About.com 2012 Reader's Choice Award for "Best Email Marketing Service". CET already uses Vertical Response for our own newsletter, the MassDEP Green Team program, and an Oil Cooperative that we run. As a non-profit, we are able to use this service at no charge and our experience using this platform will make for fast and efficient set up and delivery for Covanta Haverhill stakeholders.

CET will gather appropriate contacts that we have made through our current work and any contacts that Covanta has to add to our list. As appropriate, CET will reach out to area waste districts, recycling coordinators, MassRecycle and others who may want to be included in the correspondence.

On a quarterly basis (or more/less frequently as needs arise), CET will compile relevant stories or announcements to communicate to the list of contacts. These could include success stories of successful program implementations, reminders about including Hg collection at HHW days, links to materials on [www.keepmercuryfromrising.org](http://www.keepmercuryfromrising.org) or any other relevant web-based materials, and perhaps a friendly "hello and update" from Covanta personnel. It could also be used to announce mercury trainings offered by Covanta Haverhill or other events like the MassRecycle conference, affiliated Chamber of Commerce events, etc.

This tool would be a way to have a more direct electronic connection with the Covanta Haverhill-specific audience, without having to revamp the [keepmercuryfromrising](http://www.keepmercuryfromrising.org) website. It will also be a useful tool to demonstrate the value of being a Covanta Haverhill contracted community and all the extended benefits that come along with that relationship.

### **Budget and Reporting**

For each of the menu items above, the description and quoted pricing are intended to approximate the action items and cost for delivering the service. CET will provide all services on a time and materials basis. CET will provide Covanta with a brief quarterly report on activities and a thorough annual report by an agreed upon date. These reports will follow a format agreed upon by CET and Covanta Haverhill, which will be designed to easily conform with existing MassDEP reporting requirements and typical Covanta Haverhill reporting. CET will meet with Covanta Haverhill to set priorities and provide any necessary budgetary

refinement as needed. Billing will be no more frequently than monthly and on a time and materials basis using the following rate structure valid through 2013:

CET Project Manager: \$85/hr

CET Staff: \$65/HR

## **APPENDIX B**

### **MSP VI Budget Summary**

# COVANTA HAVERHILL INC

## Summary of MSP VI Budget

No. of Contract Communities Served	23
Tons MSW processed	600,407
Proposed budget based on \$0.50 per ton	\$300,204

	<b>Budget</b> Based on 1 year of MSP VI
<b>Consultant Outreach/Education</b>	
	50,000

<b>Facility-Level Outreach/Education</b>	
MSP Coordinator (Salary, benefits, expenses, support costs, oversight, MSP V development)	135,000
Consultant Outreach	5,000
Special Outreach Programs (community events, bus ads, etc)	10,000
	150,000

<b>Hg Product Collection Activities</b>	
(Ads, Outreach, Recycling contractor labor, transport, recycling)	30,000

<b>Thermometer Exchange Program</b>	
(Ads, Outreach, replacements)	5,000

<b>Municipal Mercury Recycling Reimbursement</b>	
	30,000

<b>Thermostat Collection Program</b>	
Tradesmen Incentives, Resident rebates & Hg Recycling costs)	15,000

<b>MSP V Budget per year</b>	<b>280,000</b>
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Covanta Haverhill MSP VI	<b>MSP VI Budget Five Year Total</b>	<b>\$1,400,000</b>
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